

Serial No. 09/746,201  
Art Unit 2174

- 2 -

Remarks/Arguments

The independent claims of the present application are 1, 9, 18, 25, and 26.

In the Office Action, the Examiner rejected all of the claims under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,112,015 to Planas et al. ("Planas") and U.S. Patent No. 6,229,538 to McIntyre et al. ("McIntyre"). The applicant respectfully traverses this rejection.

To establish a *prime facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. MPEP § 2143 (rev. Feb. 2003).

It is respectfully submitted that the cited references do not teach or suggest all the claim limitations.

Claim 1 recites "... operating an output device to ... represent each link in a first state as a line ... and represent a connection on a given network link as a line ..." [emphasis added]. In Planas, none of the connections (10) are "on" any of the links (4). Rather, as shown in Fig. 1 and described at column 4, lines 33 to 39, connections (10) are separate from links (4). McIntyre does not disclose any connections on links. Moreover, neither Planas nor McIntyre teaches or suggests operating an output device to represent a connection as a line and represent a link as a line.

For the above reasons, it is submitted that no *prima facie* case of obviousness has been established in respect of claim 1.

The remaining independent claims (claims 9, 18, 25, and 26) also recite representing, outputting or displaying a link or links as a line and a connection or connections on a given

- 3 -

network link as a line. The above argument as to the absence of a *prima facie* case of obviousness is equally applicable to these claims.

Given that the independent claims distinguish over the cited art, the remaining claims, which depend from the independent claims, also distinguish over the art of record.

In view of the foregoing, favourable reconsideration and allowance of the application are earnestly solicited.

Respectfully submitted,



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